

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

MELISSA CHINN,

Plaintiff,

v.

WHIDBEY PUBLIC HOSPITAL  
DISTRICT d/b/a WHIDBEY HEALTH  
MEDICAL CENTER,

Defendant.

No. 2:20-cv-00995-TSZ

STIPULATED MOTION AND  
ORDER ON AGREED  
MOTIONS IN LIMINE

**STIPULATION**

The parties, by and through counsel, respectfully and jointly move the Court for an in limine order concerning certain evidentiary and other issues to streamline trial and the presentation of evidence to the jury. Counsel for the parties have conferred and agree that an in limine order is appropriate, with reference to the following:

1. Pursuant to the Court's order dated September 20, 2020 (Dkt. No. 9), the parties must file all motions in limine by December 23, 2021.

2. Pursuant to Local Rule 7(d)(4), the parties held a conference call on December 22, 2021, to determine which matters are really in dispute before filing their respective

1 motions. The parties reached an agreement on a number of issues.

2 THEREFORE, IT IS HEREBY STIPULATED AND AGREED AS  
3 FOLLOWS:

- 4 1. Evidence or argument excluded by an order in limine may not be presented to the jury  
5 without prior leave from the Court.
- 6 2. Counsel shall not make reference to the substance of pre-trial motions in the presence  
7 of the jury.
- 8 3. Counsel shall not comment regarding the size of any law firm or the number of  
9 attorneys involved in litigation.
- 10 4. To protect the sensitive healthcare information of nonparties, Counsel shall redact all  
11 personal identifiers from any patient records or other documents revealing patient  
12 healthcare information and shall refer to WhidbeyHealth patients using their initials.
- 13 5. Counsel shall not present documents, testimony, or argument regarding liability  
14 insurance coverage or the absence thereof.

15 SO STIPULATED this 23rd day of December, 2021.

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17 PLLC

18 s/ Justin Steiner

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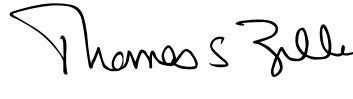
s/ Elizabeth A. Hanley

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24 *Attorneys for Plaintiff*

**ORDER**

IT IS SO ORDERED.

DATED this 5th day of January, 2022.



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Thomas S. Zilly  
United States District Judge

Jointly Presented by:

SCHROETER GOLDMARK & BENDER

s/Elizabeth A. Hanley

ELIZABETH HANLEY, WSBA #38233  
JAMAL N. WHITEHEAD, WSBA #39818  
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